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Attorneys for Defendants,
YUCAIPA-CALIMESA JOINT UNIFIED
SCHOOL DISTRICT, MICHAEL SIALANA, and
KEVIN LEWIS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

HEATHER HADNOT as Natural
Parent and *General Guardian* for D.D.
her minor son

Plaintiffs,

v.

YUCAIPA-CALIMESA JOINT
UNIFIED SCHOOL DISTRICT, in its
official capacity, MICHAEL
SIALANA, in his individual capacity,
KEVIN LEWIS, in his individual
capacity, and DOES 1-20, inclusive.

Defendants.

Case No.: 5:23-cv-00118

**JOINT STIPULATION TO
EXTEND TIME FOR
DEFENDANTS YUCAIPA-
CALIMESA JOINT UNIFIED
SCHOOL DISTRICT,
MICHAEL SIALANA, AND
KEVIN LEWIS TO RESPOND TO
PLAINTIFFS' COMPLAINT**

Complaint served: January 24, 2023
Current response date: March 27, 2023
New response date: April 27, 2023

Defendants, Yucaipa-Calimesa Joint Unified School District, Michael Sialana, and Kevin Lewis ("Defendants") and Plaintiffs Heather Hadnot as Natural Parent and *General Guardian* for D.D ("Plaintiffs") by and through their respective counsel of record, stipulate and agree to extend the time for Defendants to respond to Plaintiffs' Complaint (Dkt. 1) as follows:

1 1. On January 24, 2023, Plaintiffs' counsel mailed served the Complaint
2 on Defendants with a Notice of Lawsuit and Request for Waiver of Service of
3 Summons.

4 2. On March 19, 2023, counsel for Defendants was provided with the
5 Complaint and Notice of Lawsuit and Request for Waiver of Service of Summons
6 on all Defendants, and immediately contacted Plaintiff's counsel to advise of
7 counsel for Defendants' recent retention.

8 3. On March 21, 2023, counsel for Defendants met and conferred with
9 Plaintiff's counsel via teleconference to inform that service would be accepted via
10 the Waivers and to obtain an extension of time to respond to the Complaint on
11 behalf of all Defendants as a responsive pleading deadline was approaching on
12 March 27, 2023.

13 4. Pursuant to a stipulation made under Local Rule 8-3, the parties agreed
14 to extend Defendants' time to respond to Plaintiffs' Complaint by not more than 30
15 days, to April 27, 2023.

16 5. The stipulation was entered to allow the Parties additional time to
17 discuss and confer the allegations in the Complaint, the Defendants' arguments
18 concerning the allegations, and any potential resolution of the Complaint
19 allegations, and to fully respond within a reasonable time.

20 6. There have not been any prior requests for extensions submitted to the
21 Court by any party.

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23 **IT IS SO STIPULATED.**
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1 Date: March 31, 2023

SOLEIMAN, APC

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3 By: /s/ Matthew Soleimanpour

4 Matthew Soleimanpour
5 Attorneys for Defendants
6 YUCAIPA-CALIMESA JOINT
7 UNIFIED SCHOOL DISTRICT,
8 MICHAEL SIALANA, KEVIN
9 LEWIS

10 Date: March 31, 2023

**THE LAW OFFICE OF KEITH
ALTMAN**

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12 By: /s/ Keith Altman

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